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2022-January-03

By ECF

Hon. Paul G. Gardephe  
United States District Court Judge  
40 Foley Square, Courtroom 705  
New York, New York 10007

**Re:** *International Systems Group, Inc. v. Carmichael, et al; No. 21-CV-6301 (the “Action”)*

Dear Judge Gardephe:

We are counsel for Plaintiff International Systems Group, Inc. (“Plaintiff”). We write jointly with counsel for Defendant Carmichael Gallery (the “Defendant Gallery”) to update the Court on the status of settlement.

The parties have exchanged information and discussed the contours of a settlement, which would include the transfer of an artwork to Plaintiff. The parties have finalized terms on a memorandum of understanding, and are attempting to arrange for an inspection of the artwork by Plaintiff, but delays have arisen due to the holidays and the spread of the Omicron-variant (as the artwork is not in New York). The parties hope to complete the inspection in the next two weeks, at which point the parties can update the Court on whether settlement has been achieved (and the parties have exchanged terms on the formal settlement agreement to be executed if the inspection is successful).

As Your Honor scheduled the next status conference for January 6<sup>th</sup> at 12:30pm, we respectfully request that the status conference be adjourned for three weeks, so that the parties can report back to the Court on whether the artwork inspection was successful and settlement has been achieved.

Respectfully submitted,



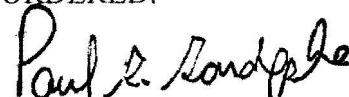
Paul Cossu

cc: All counsel of record (via ECF)

**Memo Endorsed:** The application is granted. The conference currently scheduled to take place on January 6, 2022 at 12:00 p.m. will instead take place on January 27, 2022 at 10:30 a.m.

Dated: January 5, 2022

SO ORDERED.



Paul G. Gardephe  
United States District Judge